

**MIDDLEBROOKS SHAPIRO
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Krystyna DiBlasi, Chapter 13 Debtors

In re:	: UNITED STATES BANKRUPTCY COURT
JOSEPH DiBLASI and	: FOR THE DISTRICT OF NEW JERSEY
KRYSTYNA DiBLASI,	: :
Chapter 13 Debtors.	: Honorable Donald H. Steckroth
	: Case No. 07-28891 (DHS)
	: :
COMMERCE BANK, N.A.,	: Adv. Pro. No. 08-01236
Plaintiff,	: :
v.	: :
JOSEPH DiBLASI and	: :
KRYSTYNA DiBLASI,	: Hearing Date: April 22, 2009 @ 11:00
Defendants,	: Oral Argument: Waived, Unless : Timely Opposition Filed
	: :
JOSEPH DiBLASI and	: :
KRYSTYNA DiBLASI,	: :
Third-Party Plaintiffs,	: :
v.	: :
ROBERT M. REISS,	: :
Third-Party Defendant.	: :
	: :

**NOTICE OF MOTION THIRD-PARTY PLAINTIFFS' TO ENTER DEFAULT
JUDGMENT AGAINST THIRD-PARTY DEFENDANT ROBERT REISS**

TO: **HONORABLE DONALD H. STECKROTH**
UNITED STATES BANKRUPTCY COURT
50 Walnut Street
Newark, New Jersey 07102

Robert Reiss
164 Oxford Avenue
Fairhaven, New Jersey 07704
Via Certified Mail/Return Receipt Requested Number 7007 3020 0002 8802 6065 and
First Class Mail, Postage Pre-Paid.

James G Aaron, Esq..
Ansell Zaro Grimm & Aaron
1500 Lawrence Avenue
CN-7807
Ocean, New Jersey 07712
VIA CM/ECF

To All Other Persons requesting Notice via CM/ECF

PLEASE TAKE NOTICE that on the 22nd day of April, 2009 at 11:00 am, or as soon thereafter as Counsel may conveniently be heard, Third-Party Plaintiffs, Joseph DiBlasi and Krystyna DiBlasi, in the above-captioned adversary proceeding (the "Third-Party Plaintiffs") shall move before the Honorable Donald H. Steckroth, United States Bankruptcy Judge, United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102 for an Order Entering Default Judgment Against Third-Party Defendant Robert Reiss ("Reiss") and for Related Relief.

PLEASE TAKE FURTHER NOTICE that upon the return date of the within Motion, the Third-Party Plaintiff/Debtor shall rely on the Application and Exhibits filed simultaneously herewith and oral argument, if such is necessary.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 2013-1, this motion may be deemed uncontested unless a written response is filed and served at least seven (7) days before the return date. If no responsive pleading is filed, the Court may enter the relief requested on the papers submitted.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(f), oral argument is waived unless an objection to this motion is timely filed.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, no brief is necessary as the relief sought presents no novel or complex issues of law.

**MIDDLEBROOKS SHAPIRO
& NACHBAR, P.C.**
Attorneys for Third Party Plaintiffs
Joseph DiBlasi and Krystyna DiBlasi
/s/ Stuart M. Nachbar
By: Stuart M. Nachbar, Esq.

Dated: March 17, 2009